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7 | Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

13 | GOOGLE LLC

**Plaintiff,**

V.

17 | SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA  
Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN  
SUPPORT OF GOOGLE LLC'S MOTION  
FOR LEAVE TO AMEND INVALIDITY  
CONTENTIONS PURSUANT TO PATENT  
L.R. 3-6**

I, Nima Hefazi, declare as follows and would so testify under oath if called upon to do so:

2       1. I am of counsel at the firm of Quinn Emanuel Urquhart & Sullivan, LLP and am  
3 counsel of record for Plaintiff Google LLC (“Google”). I am a member in good standing of the Bar  
4 of the State of California. I make this declaration based on my personal knowledge, unless otherwise  
5 noted. If called, I can and will testify competently to the matters set forth herein.

6 2. I make this declaration in support of Google's Motion for Leave to Amend Invalidity  
7 Contentions Pursuant to Patent Local Rule ("PLR") 3-6.

8       3.     On December 20, 2021, the parties exchanged proposed terms for construction in  
9 compliance with PLR 4-1.

10       4.      On January 10, 2022, the parties simultaneously exchanged their proposed  
11 preliminary constructions for the selected claim terms pursuant to PLR 4-2.

12        5.        Attached as Exhibit 1 is a true and correct copy of Google's proposed Amended  
13 Invalidity Contentions with redlines to reflect Google's proposed changes.

14       6.       Attached as Exhibit 2 is a true and correct copy of an August 2022 email chain  
15 between myself, counsel for Google, and Cole Richter, counsel for Sonos, Inc. (“Sonos”).

16 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
17 knowledge.

18 || Executed this 30th day of August, 2022 in Los Angeles, California.

20 | DATED: August 30, 2022

Respectfully submitted,

By /s/ *Nima Hefazi*

1 **ATTESTATION**

2 I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the  
3 above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has  
4 concurred in the aforementioned filing.

5  
6 DATED: August 30, 2022

7 /s/ Charles K. Verhoeven

8 Charles K. Verhoeven

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